



# Caddo Parish Communications

## District Number One

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March 26, 2002

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Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D. C. 20554

RE: RM-10077 Modification of Section 90.20 (c) of the Commission's  
Rules to Permit Use of Any Certified Public Safety Frequency  
Coordinator for Channels Below 470MHz

I am writing on behalf of the Caddo Parish Communications District (District) to express support of the petition filed by the Association of Public Safety Officials International (APCO) to modify the frequency coordination process for public safety channels below the 470 MHz bands.

The goal of this petition is to provide applicants with more choices, improve efficiency, and simplify the frequency coordination process. It is the District's belief that applicants will benefit from this change, since it will allow them a choice of coordinators. It will also provide for "one-stop shopping" for applications seeking approval for multiple frequencies.

APCO's petition has been pending for over one year. I would like to respectfully request that the Federal Communications Commission move forward with its consideration of this petition and issue a Notice of Proposed Rulemaking. Should you have any questions or need any additional information, you may contact me at (318)675-2222. Thank you for your consideration.

Sincerely yours,

*Martha Carter*

Martha Carter  
9-1-1 Administrator

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cc: Mr. Thomas Sugrue, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission

445 12th Street, SW  
Washington, DC 20554

Once the Notice of Proposed Rulemaking is issued, there will be additional opportunity for comments, which should reference the FCC docket number assigned at that time.

Your letters and comments must include a correct address, the proceeding number and title, your clear and concise text and your name and contact information. Letters on official stationery are appropriate. More detailed instructions are located: <http://www.fcc.gov/osec/guidelines.html>

**Filing comments electronically:**

There are several methods of submitting comments electronically to the FCC.

General information regarding filing comments with the Commission electronically:  
<http://www.fcc.gov/e-file/ecfs.html>

Online comment filing:  
[http://gullfoss2.fcc.gov/prod/ecfs/upload\\_v2.cgi](http://gullfoss2.fcc.gov/prod/ecfs/upload_v2.cgi)

Email comment instructions:  
<http://www.fcc.gov/e-file/email.html>

Note: Your comment need not be complicated. A basic letter indicating support of the petition in your words and, if appropriate, include specific information to your agency relating specific instances where this petition would be of benefit to your agency. The Commission does not look favorably upon "form" letters. Try to make your comment unique.

## Call to support APCO Petition

APCO is asking for your support for a petition that it has filed with the FCC. APCO is seeking to open up the frequency coordination process for public safety channels in bands below 470 MHz. **Our goal is to provide applicants with more choices, improve efficiency, and simplify frequency coordination.**

Prior to 1997 the public safety assignments were segregated into separate pools of frequencies for police, fire, EMS, highway maintenance, forestry conservation, and local government, each with its own specific coordinator. In 1997, the FCC consolidated the public safety services into a single Public Safety Pool. From that point forward, public safety agencies were free to apply for any public safety pool channel. However, the FCC retained the separate frequency coordination responsibilities for channels that had previously been in service-specific pools. Thus, for example, while a police department can now apply for a channel previously reserved for highway maintenance agencies, it must use the designated highway coordinator (AASHTO). The only exception are channels that had been in the local government frequency pool, which can now be coordinated by any public safety coordinator (APCO, IMSA, AASHTO, or FCCA).

APCO has filed a petition asking the FCC to change this rule so that any of the four public safety coordinators can coordinate any of the public safety pool channels below 470 MHz. This is consistent with the FCC's recent ruling that the other three coordinators can now coordinate 800 MHz public safety channels, for which APCO had previously been the sole coordinator.

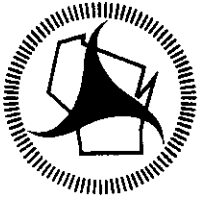
APCO believes that **applicants will benefit from this change and it provides them with a choice of coordinators.** It will also **allow for "one-stop shopping" for applications seeking multiple frequencies**, which now often require complicated approval from multiple coordinators. As they have in other contexts, the coordinators will continue to share information and monitor channel assignments to protect existing frequency assignments.

APCO's petition has now been pending for over a year, and your support is needed to move the process forward. You can help by writing to the FCC and urging them to act on APCO's petition and issue a Notice of Proposed Rulemaking (the next step in the regulatory process). Your letter should reference "***RM-10077, Modification of Section 90.20(c) of the Commission's Rules to Permit Use of Any Certified Public Safety Frequency Coordinator for Channels Below 470 MHz,***" and should be addressed to:

Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

With a copy to:

Thomas Sugrue, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission



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## Wisconsin Department of Transportation

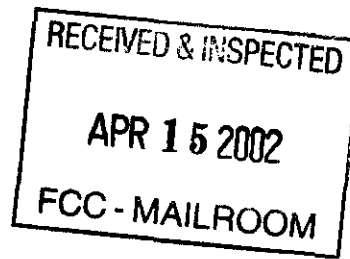
www.dot.state.wi.us

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April 1, 2002

Re: RM10077, Modification of Section 90.20(c) of the Commission's Rules to Permit Use of Any Certified Public Safety Frequency Coordinator For Channels Below 470 MHz

The State of Wisconsin supports the petition of the Association of Public Safety Communications Officials (APCO) in RM-10077. We believe that modification of Section 90.20(c) of the Commission's rules to permit use of any certified public safety frequency coordinator for channels below 470 MHz will be beneficial to public safety agencies. This change will result in:

- reduced processing time for many applications
- reduced frequency coordination fees for many applications
- a choice in frequency coordinators

We ask the FCC to move forward with implementation of APCO's proposal.

Sincerely,

David A. Hewitt, Director  
Bureau of Communications

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